

1 Marjorie Hauf, Esq.  
2 Nevada Bar No.: 8111  
3 Matthew G. Pfau, Esq.  
4 Nevada Bar No.: 11439  
5 Cara Xidis, Esq.  
6 Nevada Bar No.: 11743  
7 H&P LAW  
8 710 South 9th Street  
9 Las Vegas, NV 89101  
10 702 598 4529 TEL  
11 702 598 3626 FAX  
12 e-file@courtroomproven.com  
13 Attorneys for Plaintiff

14 UNITED STATES DISTRICT COURT  
15 DISTRICT OF NEVADA

16 \* \* \*

17 **Courtney Cloud,**

18 Case No.: 2:23-cv-00468-JCM-DJA

19 Plaintiff,

20 vs.

21 **Allstate Indemnity Company;** Does 1  
22 through 10, inclusive, and Roe  
23 Corporations 1 through 10, inclusive,

24 Defendants.

25 **Stipulation and [Proposed] Order to  
26 Extend Deadlines  
(3<sup>rd</sup> Request)**

27 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties hereto,  
28 by and through their respective counsel of record, that the discovery deadlines in  
this case be extended as follows:

29 **A. COMPLETED DISCOVERY**

30 1. Plaintiff has served her initial disclosures of witnesses and documents, and  
31 supplements thereto;

32 2. Defendant Allstate Indemnity Company has served their initial disclosures of  
33 witnesses and documents, and supplements thereto;

34 3. Plaintiff has propounded and answered written discovery requests;



1       4. Defendant Allstate Indemnity Company has propounded and answered  
2       written discovery requests;  
3       5. Plaintiff has taken the deposition of Allstate Employee Sean Owens;  
4       6. Plaintiff has taken the deposition of Allstate Employee Christine Fox;  
5       7. Plaintiff has taken the deposition of Allstate Employee Jonathan Bourne;  
6       8. Plaintiff has taken the deposition of Allstate Employee Rodney Farney;  
7       9. Defendant has taken the deposition of Plaintiff Courtney Cloud;  
8       10. Plaintiff has noticed the deposition of Allstate Employee Steven Peterson;  
9       11. Defendant has noticed the deposition of Plaintiff's Expert, Steven Strzelec;  
10       12. Plaintiff and Defendant have disclosed their initial expert witnesses and  
11       supplements thereto;  
12       13. Defendant has taken the deposition of Plaintiff's Expert Paul Thomas.

13

14 **B. OUTSTANDING DISCOVERY**

15       1. Deposition of the Allstate Indemnity Company's FRCP 30(b)(6) witness;  
16       2. Depositions of expert witnesses;  
17       3. Depositions of fact witnesses;  
18       4. Disclosure of rebuttal expert witnesses;  
19       5. Additional written discovery;  
20       6. Disclosure of additional documents.

21

22 **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

23       Counsel for the parties have been diligent in conducting discovery but need  
24 additional time to depose witnesses and conduct additional discovery. The  
25 deposition of Allstate Employee Steven Peterson was scheduled to take place on  
26 April 9, 2024, but had to be rescheduled due to unforeseen circumstances arising  
27 out of the tragic shooting at the office of Prince Law Group on April 8, 2024. Counsel  
28 for Allstate, Mr. Keating, had to leave the office suddenly on April 8, 2024, which was



1 the date of the deposition preparation appointment for Steven Peterson, as his  
 2 brother-in-law worked at Prince Law Group. The deposition is now set to take place  
 3 on June 4, 2024. Therefore, there is good cause to extend the discovery deadline as  
 4 requested. As such, the parties request a 60-day extension of the discovery  
 5 deadlines.

6 **D. PROPOSED EXTENDED DEADLINES**

7 The parties have agreed to extend the discovery deadlines in this case, as follows:

	<b>CURRENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	Closed	Closed
Rebuttal expert disclosures	May 8, 2024	May 8, 2024
Close of Discovery	June 5, 2024	August 7, 2024
Dispositive motions	July 8, 2024	September 6, 2024
Pretrial Order	August 7, 2024	October 7, 2024, or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

19 Dated this 19<sup>th</sup> day of April, 2024.

20 H&P LAW

21 /s/ Marjorie Hauf  
 22 Marjorie Hauf, Esq.  
 Nevada Bar No. 8111  
 Cara Xidis, Esq.  
 Nevada Bar No. 11743  
 Attorneys for Plaintiff

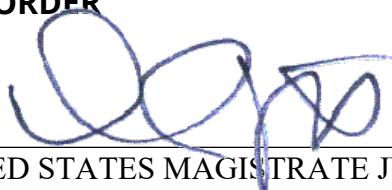
Dated this 19<sup>th</sup> day of April, 2024.

KEATING LAW GROUP

/s/ John T. Keating  
 John T. Keating, Esq.  
 Nevada Bar No. 6373  
 Attorney for Defendant

25 IT IS SO ORDERED.

26 DATED: 4/22/2024

27  
 28   
 ORDER  
 UNITED STATES MAGISTRATE JUDGE